

DOCKETED

FILED

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

THE MAGNAVOX COMPANY, as  
Corporation, and SANDERS  
ASSOCIATES, INC., a  
Corporation,

Plaintiffs,

v.

BALLY MANUFACTURING  
CORPORATION, a Corporation,  
et al.,

Defendants.

CIVIL ACTION No. 74 C 1030

DEFENDANT WILLIAMS ELECTRONICS, INC.'S  
ANSWERS AND OBJECTIONS TO PLAINTIFFS' INTERROGATORIES  
NOS. 197-212 TO DEFENDANTS

Defendant, Williams Electronics, Inc., hereby answers  
Plaintiffs' Interrogatories Nos. 197-212 to Defendants in  
accordance with Rule 33 of the Federal Rules of Civil Procedure.

Interrogatory No. 197

197. Has defendant ever acquired or had in its possession  
one or more of the video game apparatus sold by plaintiff The  
Magnavox Company under the trademark ODYSSEY?

ANSWER: Yes.

198. If the response to interrogatory 197 is in the af-  
firmative, state the date or dates on which defendant acquired  
or came into possession of each such apparatus.

ANSWER: Sometime in 1973.

199. If the response to interrogatory 197 is in the affirmative, state the purpose for which defendant acquired or came into possession of each such apparatus.

ANSWER: To satisfy the curiosity of some of defendant's employees about the game.

200. Has defendant ever examined, inspected, or analyzed or had examined, inspected, or analyzed on its behalf one or more of the video game apparatus sold by plaintiff The Magnavox Company under the trademark ODYSSEY?

ANSWER: Yes.

201. If the response to interrogatory 200 is in the affirmative, state the date or dates on which defendant made or caused to be made each such examination, inspection, or analysis.

ANSWER: On undetermined date or dates in late 1973 or early 1974.

202. If the response to interrogatory 200 is in the affirmative, state the purpose for which defendant made or caused to be made each such examination, inspection, or analysis.

ANSWER: To satisfy the curiosity of some of defendant's employees about the game.

203. If the response to interrogatory 200 is in the affirmative, identify the person, persons, party, and/or parties who performed any such examination, inspection, or analysis.

ANSWER: Robert Jonesi	Raymond Macie
655 South Fair Oaks	Williams Electronics, Inc.
Apartment N 104	3401 N. California Ave.
Sunnyvale, Cal. 94086	Chicago, Illinois 60618

204. If the response to interrogatory 200 is in the affirmative, identify the person, persons, party, and/or parties to whom the results or findings from any such examination, inspection, or analysis were communicated.

ANSWER: No one.

205. If the response to interrogatory 200 is in the affirmative, identify each document relating to any such examination, inspection, or analysis.

ANSWER: No such documents exist.

206. Has defendant ever learned of or received any results or findings from any analysis, examination, or inspection of one or more of the video game apparatus sold by plaintiff The Magnavox Company under the trademark ODYSSEY?

ANSWER: No.

207. If the response to interrogatory 206 is in the affirmative, identify the person, persons, party, and/or parties that performed each such analysis, examination, or inspection.

ANSWER: No answer required.

208. If the response to interrogatory 206 is in the affirmative and the results or findings were communicated to defendant in written form, identify each document containing such communication:

ANSWER: No answer required.

209. If the response to interrogatory 207 is in the affirmative and the findings were communicated to defendant in oral form, state: (a) the date or dates on which every such oral communication occurred; (b) the persons between which each such oral communication occurred; and (c) the substance of each such oral communication.

ANSWER: No answer required.

210. Has defendant entered into any patent license agreement under any United States patent or patent application relating to video game apparatus?

ANSWER: No.

211. If the response to interrogatory 210 is in the affirmative, as to each such license state: (a) the identity of the licensor; (b) the identity of the licensee; (c) the identity of the licensed patent, patents, patent application, or patent applications; and (d) the consideration given or received in exchange for a license under the licensed patent, patents, patent application, or patent applications.

ANSWER: No answer required.

212. Has defendant had any communication with any other defendant in this action other than defendants to which it is related by a corporate parent-subsidary relationship or corporate cosubsidiary relationship?

ANSWER: Objected to. The information sought does not appear reasonably calculated to lead to the discovery of admissible evidence since it is so general as to include all communications regardless of time reference or subject matter of such communications.

213. If the response to interrogatory 212 is in the affirmative and any such communication was in written form, identify each document containing such communication and state the substance thereof.

ANSWER: Objected to for the reasons given in the answer to interrogatory 212.

214. If the response to interrogatory 212 is in the affirmative and any such communication was in oral form, state: (a) the date or dates on which every such oral communication occurred; (b) the persons between which each such oral communication occurred; and (c) the substance of each such oral communication.

ANSWER: Objected to for the reasons given in the answer to interrogatory 212.

STATE OF ILLINOIS     )  
                              ) SS.  
COUNTY OF C O O K    )

I, Melvin M. Goldenberg, being duly sworn, do hereby state that the foregoing Defendant Williams Electronics, Inc.'s

Answers and Objections to Plaintiffs' Interrogatories Nos. 197-212 to Defendants are provided by me on the basis of my personal knowledge and my information and belief based on information communicated to me by employees of Williams Electronics, Inc.

Melvin M. Goldenberg  
Melvin M. Goldenberg

Subscribed and sworn to before me this 2nd day of May, 1975.

Louise J. Donley  
Notary Public